U.S. Department of Justice

Antitrust Division

New York Office

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New York, New York 10278-0004   *FAX 212/335-8023*

May 12, 2015

BY ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

          Re: *SULLIVAN v. BARCLAYS PLC, ET AL.*, 1:13-cv-02811(PKC)

Dear Judge Castel:

The United States Department of Justice, through the Fraud Section of the Criminal Division and the Antitrust Division (collectively, the "Government"), writes to provide the Court with an update on its position for discovery in the above captioned matter.

On September 11, 2014, the Court granted the Government's motion to intervene and for a stay of discovery in the above captioned matter until May 12, 2015, subject to an application for an extension. At this time, the Government does not object to document discovery in this matter beginning immediately. With respect to other forms of discovery, the Government proposes a tailored approach whereby the parties provide advance notice to the Government of the nature of any proposed depositions, interrogatories or requests for admission so that it has an opportunity to object should the discovery conflict with the needs of the ongoing criminal investigation and any subsequent prosecutions. We have conferred with counsel for the plaintiffs, who do not object to our position.

                                Respectfully submitted,

                                ANDREW WEISSMANN
                                Chief, Fraud Section
                                Criminal Division

Hon. P. Kevin Castel
Sullivan v. Barclays PLC, et al., 1:13-cv-02811 (PKC) – *Letter re: Discovery Stay*
May 12, 2015

By: _____
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By: _____
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cc: (counsel of record via ECF)

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